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13 Attorneys for Defendants THE GUILD LAW SCHOOL DBA  
14 PEOPLE'S COLLEGE OF LAW, JOSHUA GILLENS,  
15 WILLIAM MAESTAS, BOARD OF DIRECTORS FOR THE  
16 PEOPLE'S COLLEGE OF LAW, CHRISTINA MARIN  
17 GONZALEZ; ROGER ARAMAYO; ISMAIL VENEGAS;  
18 CLEMENTE FRANCO; HECTOR PENA; PASCUAL  
19 TORRES; CAROL DEUPREE; JESSICA VIRAMONTES;  
20 JUAN SARINANA; ADRIANA ZUNIGA; PREM SARIN;  
21 DAVID BOUFFARD; and HECTOR SANCHEZ

22

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

16 TODD R. G. HILL,  
17 Plaintiff,  
18 v.  
19 THE BOARD OF DIRECTORS,  
20 OFFICERS AND AGENTS AND  
INDIVIDUALS OF THE PEOPLES  
COLLEGE OF LAW; et al.  
22 Defendants.

Case No. 2:23-cv-01298-CV-BFM

**DEFENDANTS' CASE  
MANAGEMENT STATEMENT**

Judge: Cynthia Valenzuela  
Magistrate Judge Brianna Fuller Mircheff

23 To THE HONORABLE COURT AND TO ALL PARTIES AND THEIR  
24 ATTORNEYS OF RECORD:

25 COMES NOW the Defendants THE GUILD LAW SCHOOL DBA  
26 PEOPLE'S COLLEGE OF LAW, JOSHUA GILLENS, WILLIAM MAESTAS,  
27 BOARD OF DIRECTORS FOR THE PEOPLE'S COLLEGE OF LAW,  
28 CHRISTINA MARIN GONZALEZ; ROGER ARAMAYO; ISMAIL VENEGAS;

1 CLEMENTE FRANCO; HECTOR PENA; PASCUAL TORRES; CAROL  
2 DEUPREE; JESSICA VIRAMONTES; JUAN SARINANA; ADRIANA ZUNIGA;  
3 PREM SARIN; DAVID BOUFFARD; and HECTOR SANCHEZ (hereinafter  
4 collectively referred to as “Defendants”) submits the following Separate Case  
5 Management Statement.

6 a. Date the Case was Filed: February 20, 2023

7 b. List of Parties:

- 8 • The Guild Law School dba People’s College of Law
- 9 • Joshua Gillens
- 10 • William Maestas
- 11 • Board of Directors for the People’s College of Law
- 12 • Christina Marin Gonzalez
- 13 • Roger Aramay
- 14 • Ismail Venegas
- 15 • Clemente Franco
- 16 • Hector Pena
- 17 • Pascual Torres
- 18 • Carol Deupree
- 19 • Jessica Viramontes
- 20 • Juan Sarinana
- 21 • Adriana Zuniga
- 22 • Prem Sarin
- 23 • David Bouffard
- 24 • Hector Sanchez
- 25 • Robert Ira Spiro
- 26 • Louisa Ayrapetyan
- 27 • Natalie Leonard
- 28 • Leah Wilson

- 1       • Brandon Stallings
- 2       • Ruben Duran
- 3       • Hailyn Chen
- 4       • Audrey Ching
- 5       • Melanie Shelby
- 6       • Arnold Sowell, Jr.
- 7       • Mark Toney
- 8       • Paul Kramer
- 9       • Jean Krasilnikoff
- 10      • Ellin Davtyan
- 11      • George Cardona
- 12      • Devan McFarland
- 13      • Enrique Zuniga

14      c.     Brief Summary of Claims: Plaintiff's Third Amended Complaint

15 includes causes of action for: Equal Protection Violation under the 14<sup>th</sup> Amendment;  
16 Violation of the Unruh Civil Acts; Title VI of the Civil Rights Act of 1964 – Racial  
17 Discrimination; RICO – Damages Under Racketeer Influenced and Corrupt  
18 Organizations Act; Conspiracy; Negligence and Negligence Per Se; Negligent  
19 Hiring, Retention, and Supervision; and Violation of Title IX of the Education  
20 Amendment.

21       The Third Amended Complaint alleges Defendants discriminated against him  
22 based on his race and gender. Specifically, Plaintiff alleges several Defendants  
23 denied him equal access to educational opportunities and engaged in practices that  
24 disproportionately impacted African American students. The Third Amended  
25 Complaint also states that Defendants discriminated committed wire fraud.

26       There are no counter-claims, cross-claims, and third-party claims.

27      d.     Description of the events underlying the action: Plaintiff has filed  
28 several amended Complaints in this matter. All Defendants have moved to dismiss

1 the Amended Complaints and the Court has dismissed each Complaint dismissed for  
2 violating Rule 8, and other issues. The magistrate judge has also recommended  
3 Plaintiff's Third Amended Complaint be dismissed for failure to state a federal  
4 cause of action against any Defendant.

5 e. Description of Damages: Plaintiff's Third Amended Complaint  
6 contains several pages of requested remedies. Many of the requested damages have  
7 no basis by which they can be awarded. For example, the Third Amended  
8 Complaint requests "... [T]he Court order the Defendants to issue a public statement  
9 acknowledging their wrongdoings and offering a sincere apology to Plaintiff and all  
10 other students who have been adversely affected by their actions and inaction."  
11 (Plaintiff's Third Amended Complaint at 51:16-20) Moreover, "The Plaintiff further  
12 requests that the Court order the Defendants to establish a restitution fund to  
13 compensate all students who have suffered financial loss or other losses as a result  
14 of the Defendants' conduct." (Plaintiff's Third Amended Complaint at 51:22-25)  
15 The only listed remedy with an amount that can be calculated is Plaintiff's request  
16 for treble damages in the amount of \$750,000.

17 f. Status of Discovery: No discovery has occurred. Each Defendant's  
18 Amended Complaints has been dismissed. Additionally, there has been no order for  
19 a scheduling conference.

20 g. Procedural History: Plaintiff filed his Complaint on February 20, 2023.  
21 The Court dismissed the Complaint on its own motion and gave Plaintiff leave to  
22 amend. Plaintiff filed his First Amended Complaint on April 5, 2023 and filed a  
23 Motion for Leave to supplement the First Amended Complaint on May 5, 2023. The  
24 Court dismissed the First Amended Complaint and denied the supplemented First  
25 Amended Complaint. The Court provided Plaintiff 21 days to amend his First  
26 Amended Complaint, but Plaintiff failed to file an amended Complaint within the  
27 time allotted. Subsequently, the Court issued a Judgement of Dismissal for failure to  
28 file a Second Amended Complaint on July 27, 2023. Plaintiff then filed a Second

1 Amended Complaint and Motion for Leave to file and Amended Complaint on  
2 September 7, 2023. The Court granted Plaintiff's motion to set aside the dismissal  
3 and allowed Plaintiff to file another amended Complaint. Plaintiff filed his Second  
4 Amended Complaint on September 7, 2023. All Defendants moved to dismiss the  
5 Second Amended Complaint and the Court dismissed it on August 5, 2024. Plaintiff  
6 then filed his Third Amended Complaint on August 26, 2024. All Defendants again  
7 opposed the Complaint and the magistrate Judge recommended it be dismissed on  
8 February 12, 2025. Specifically, the magistrate judge's recommendation included a  
9 dismissal without leave to amend for the first, third, fifth, and eighth causes of  
10 action against Defendants and the State Bar defendants. The recommendation  
11 dismissed the remaining causes of action without leave to the State Bar defendants,  
12 but allowed Plaintiff leave to amend as to Defendants and defendant Ira Spiro.

13 h. Deadlines in Place: There were no deadlines in place prior to  
14 reassignment.

15 i. Magistrate Judge Consent: We consent to a magistrate judge for trial.  
16 j. Statement Regarding Magistrate Judge: We have discussed the  
17 magistrate consent program with our clients. Additionally, the parties have met and  
18 conferred regarding the program.

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1                   k.     Whether a Scheduling Conference is Required: There is no immediate  
2 need for a scheduling conference. The magistrate judge recommended Plaintiff's  
3 Third Amended Complaint be dismissed, but the parties have yet to file objections  
4 to the recommendation and the Court has not ruled on the recommendation. Thus, it  
5 would be premature to hold a scheduling conference.

6 DATED: February 20, 2025                   HAIGHT BROWN & BONESTEEL LLP

7

8                   By:     /s/Jeffrey Kirwin

9                   Yvette Davis

10                  Arezoo Jamshidi

11                  Jeffrey Kirwin

12                  Attorneys for Defendants THE GUILD  
13                  LAW SCHOOL DBA PEOPLE'S  
14                  COLLEGE OF LAW, JOSHUA  
15                  GILLENS, WILLIAM MAESTAS,  
16                  BOARD OF DIRECTORS FOR THE  
17                  PEOPLE'S COLLEGE OF LAW,  
18                  CHRISTINA MARIN GONZALEZ;  
19                  ROGER ARAMAYO; ISMAIL  
20                  VENEGAS; CLEMENTE FRANCO;  
21                  HECTOR PENA; PASCUAL TORRES;  
22                  CAROL DEUPREE; JESSICA  
23                  VIRAMONTES; JUAN SARINANA;  
24                  ADRIANA ZUNIGA; PREM SARIN;  
25                  DAVID BOUFFARD; and HECTOR  
26                  SANCHEZ

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1 **PROOF OF SERVICE**

2 Hill v. The Board of Directors, Officers, et al.

3 Case No. 2:23-cv-01298-JLS-CFM

4 **STATE OF CALIFORNIA, COUNTY OF ORANGE**

5 At the time of service, I was over 18 years of age and not a party to this  
6 action. I am employed in the County of Orange, State of California. My business  
6 address is 2030 Main Street, Suite 1525, Irvine, CA 92614.

7 On February 20, 2025, I served true copies of the following document(s)  
8 described as **DEFENDANTS' CASE MANAGEMENT STATEMENT** on the  
interested parties in this action as follows:

9 **SEE ATTACHED SERVICE LIST**

10 **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed  
the document(s) with the Clerk of the Court by using the CM/ECF system.  
11 Participants in the case who are registered CM/ECF users will be served by the  
CM/ECF system. Participants in the case who are not registered CM/ECF users will  
12 be served by mail or by other means permitted by the court rules.

13 I declare under penalty of perjury under the laws of the United States of  
America that the foregoing is true and correct and that I am employed in the office  
14 of a member of the bar of this Court at whose direction the service was made.

15 Executed on February 20, 2025, at Irvine, California.

16  
17 */s/ Cindy Mulder*  
18 Cindy Mulder

**SERVICE LIST**  
**Hill v. The Board of Directors, Officers, et al.**  
**Case No. 2:23-cv-01298-JLS-CFM**

5 Todd R. G. Hill  
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# Haight